

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

IN RE: UBER TECHNOLOGIES, INC.
PASSENGER SEXUAL ASSAULT
LITIGATION

Case No. 23-md-03084-CRB

Honorable Charles R. Breyer

This Document Relates to:

Jaylynn Dean v. Uber Techs., Inc.,
N.D. Cal. No. 23-cv-06708
D. Ariz. No. 25-cv-4276

**DECLARATION OF SARA BETH CRAIG IN
SUPPORT OF PLAINTIFF'S STATEMENT
REGARDING DEFENDANTS'
ADMINISTRATIVE MOTION TO
CONSIDER WHETHER ANOTHER
PARTY'S MATERIAL SHOULD BE FILED
UNDER SEAL**

DECLARATION OF SARA BETH CRAIG ISO PLAINTIFF'S STATEMENT REGARDING DEFENDANTS'
ADMINISTRATIVE MOTION TO CONSIDER WHETHER ANOTHER PARTY'S MATERIAL SHOULD BE FILED
UNDER SEAL

N.D. CAL. NO. 3:23-MD-03084

1 I, Sara Beth Craig, declare:

2 1. I am an attorney in the law firm of Peiffer Wolf Carr Kane Conway & Wise, LLP, and
3 counsel for Plaintiffs in the above-captioned Multi-District Litigation. I am a member of the State Bar of
4 California and am admitted to practice before this Court. I make this declaration based on my own personal
5 knowledge. If called upon to testify, I could and would testify competently to the truth of the matters stated
6 herein. I respectfully submit this declaration in support of Plaintiff's Statement in Support of Defendants'
7 Administrative Motion to Consider Whether Another Party's Material Should be Filed Under Seal.

8 2. I have reviewed Defendants' Motion to Permit Evidence Under FRE 412 and Exhibits 1-4
9 to the Declaration of Laura Vartain Horn filed at ECF Nos. 4824, 4824-2, 4824-3, 4824-4, and 4824-5,
10 respectively.

11 3. Defendants' Motion includes intimate and sensitive aspects of Plaintiff's and third parties'
12 personal lives, Plaintiff's medical history, and the names of third parties.

13 4. Exhibit 1 includes intimate and sensitive aspects of Plaintiff's and third parties' personal
14 lives, Plaintiff's medical and mental health history, and the names of third parties.

15 5. Exhibit 2 includes intimate and sensitive aspects of Plaintiff's and third parties' personal
16 lives.

17 6. Exhibit 3 includes the middle name and birth date of Plaintiff, information regarding
18 substance abuse by Plaintiff and third parties, the intimate and sensitive aspects of Plaintiff's and third
19 parties' personal lives, the names of third parties, the name of a bellwether plaintiff proceeding under
20 pseudonym, and Plaintiff's medical and mental health history.

21 7. Exhibit 4 includes the intimate and sensitive aspects of Plaintiff's and third parties' personal
22 lives and the names of third parties.

23 8. Disclosure of the identified information in Defendants' Motion and Exhibits 1-4 would
24 cause significant privacy harms resulting in public humiliation, reputational damage, unwanted media
25 attention, annoyance, and embarrassment.

26 9. The significant privacy concerns of Plaintiffs and third parties outweigh the public's
27 minimal interest in knowing their identities or personal information. The public's interest in the case may

1 be satisfied without revealing this information.

2 10. There is no less restrictive alternative to sealing portions of Defendants' Motion and
3 Exhibits that would protect the legitimate privacy interests of plaintiffs and third parties, as describing the
4 information would reveal its contents. Plaintiff's request is narrowly tailored to seal only PII and highly
5 sensitive information.

6 11. This Court's PTO. 39 excludes testimony and evidence contained in Defendants' Motion
7 and Exhibits.

8 I declare under penalty of perjury that the foregoing is true and correct.

9 Executed on January 8, 2026 in Phoenix, Arizona.

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11 /s/ Sara Beth Craig
12 Sara Beth Craig
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